

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

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**ESTATE OF LALIAH SWAYZER, *et al.*,**

**Plaintiffs,**

**Case No. 16-CV-1703**

**v.**

**DAVID J. CLARKE, JR., *et al.*,**

**Defendants.**

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**COUNTY DEFENDANTS' MOTION TO REPRIMAND  
ATTORNEY GENDE FOR PROFESSIONAL MISCONDUCT**

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Defendants Milwaukee County, Kimberly Witkowiak, Keziah Love, Terina Cunningham, Jeff Andrykowski, and Wisconsin County Mutual Insurance Company (collectively, “the County Defendants”), by their counsel, Douglas S. Knott of Leib Knott Gaynor LLC, hereby move the Court pursuant to General L.R. 83(d) for an order reprimanding Attorney James Gende for engaging in media commentary, disseminating evidence, and facilitating prejudicial pretrial publicity in violation of Wisconsin Supreme Court Rule 20:3.6(a). Defendants request that the Court grant an order:

1. Finding that Mr. Gende’s conduct violated the Wisconsin Supreme Court Rule 20:3.6(a);
2. Reprimanding Mr. Gende for the conduct pursuant to General L.R. 83(d);
3. Directing Mr. Gende to not engage in further conduct in violation of Wisconsin Rules of Professional Conduct; and
4. Awarding the County Defendants their actual attorneys’ fees associated with this motion.

The motion is supported by a brief and Declaration of Douglas S. Knott filed herewith.

Dated this 3<sup>rd</sup> day of July, 2019.

**LEIB KNOTT GAYNOR LLC**

By: /s/ Douglas S. Knott

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